

REMARKS

This Amendment is in response to the Final Office Action mailed April 9, 2003. In the Office Action the Examiner rejected claims 1-6, 13-16, 23-35, 41, 43 and 62-66 and objected to claims 7-12 and 17-22. With this Amendment, claim 1 is amended and the remaining claims are unchanged. Reconsideration and allowance of claims 1-35, 41, 43 and 62-65 are respectfully requested in view of the following remarks.

On page 2 of the Office Action the Examiner rejected claims 1-6, 13-16, 23-35, 41, 43 and 62-66 under 35 U.S.C. §103(a) as being unpatentable over Turtle U.S. Patent No. 5,265,065 in view of Liddy et al. U.S. Patent No. 6,006,221. The Examiner indicated that Turtle taught all of the elements of claim 1 including obtaining a set of relations, identifying constituents in the first textual input that have the relations, and determining the relationship between the first and the concept note of the document representation based on the constituents identified. The Examiner indicated that Turtle did not explicitly teach a second textual input that have relations, but that Liddy taught a second textual input that have relations.

On June 3, 2003 an Examiner interview was held between Examiner Pardo and Applicant's attorneys Nathan M. Rau and Joseph R. Kelly. During the interview the Applicants explained the novel features of the present invention in view of the prior art of record, namely the Turtle and Liddy references. Following a thorough discussion of the features of the present invention and the teachings of the prior art, the Examiner indicated that the rejections of claims 3, 13, 23, 33, 62, 63 and 65 as well as those claims that depended either directly or indirectly from these claims had been overcome in view of the prior art of record. Therefore, in light of the Examiner's indication and the outcome of the interview reconsideration and withdrawal of the rejection are respectfully requested.

During the interview, the Examiner authorized the Applicant to amend claim 1 to include additional language following the term "relation". Therefore, the Applicant is amending claim 1 to include the limitation that the "obtained set of relations" includes grammatical relations or case. This additional language is provided in the Specification. The Examiner indicated that subject to further search of the prior art that claim 1 is amended also overcame the rejections based on the prior art currently of record. Therefore, the Applicant respectfully requests entry of this Amendment and reconsideration and withdrawal of the rejection.

Referring to independent claim 41 of the present invention, claim 41 is directed to a computer readable medium storing a data structure used in determining a relationship between the

first and second textual inputs. The data structure comprises a plurality of pre-computed aspects of at least one of the first and second textual inputs. These pre-computer aspects are useful in determining the relationship between the first and second textual inputs. Further, claim 41 requires that the plurality of pre-computed aspects includes a linguistic analysis of at least a portion of the first and second textual input. As discussed in the interview, Turtle does not teach or suggest the use of a pre-computed linguistic analysis as a factor in a data structure used in determining the relationship between first and second textual inputs. Specifically, this pre-computed linguistic analysis refers to the set of relations that are used to determine the constituents that comprise either the first or second textual input. Therefore, it is believed that independent claims 41 is allowable over the prior art of record. Furthermore, dependent claim 43 is believed allowable over the prior art of record. Reconsideration and withdrawal of the rejection are respectfully requested.

In conclusion, it is believed that none of the prior art of record either taken singularly or in combination teaches or suggests the features of claims 1-35, 41, 42, and 62-66. Therefore, these claims are believed allowable over the prior art of record. Reconsideration and allowance of claims 1-35, 41, 42, and 62-66 are respectfully requested.

The Director is authorized to charge any fee deficiency required by this paper or credit any overpayment to Deposit Account No. 23-1123.

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